



[NRC-2012-0055]

**Changes to the Generic Aging Lessons Learned (GALL) Report Revision 2 AMP XI.M41,  
“Buried and Underground Piping and Tanks”**

**AGENCY:** Nuclear Regulatory Commission.

**ACTION:** Draft interim staff guidance; request for public comment.

**SUMMARY:** The U.S. Nuclear Regulatory Commission (NRC) requests public comment on Draft License Renewal Interim Staff Guidance (LR-ISG), LR-ISG-2011-03, “Changes to GALL Report Revision 2 Aging Management Program (AMP) XI.M41, ‘Buried and Underground Piping and Tanks’.” This LR-ISG provides changes to the recommendations in GALL Report Revision 2 AMP XI.M41 based on the staff’s review of several license renewal applications’ buried and underground piping and tanks aging management programs and stakeholder input. The draft LR-ISG proposes to revise an NRC staff-recommended aging management program in NUREG-1801, Revision 2, “Generic Aging Lessons Learned (GALL) Report,” and the NRC staff’s aging management review procedure and acceptance criteria contained in NUREG-1800, Revision 2, “Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants” (SRP-LR).

**DATES:** Submit comments by **[INSERT DATE: 30 DAYS FROM DATE OF PUBLICATION]**. Comments received after this date will be considered, if it is practical to do so, but the NRC staff is able to ensure consideration only for comments received on or before this date.

**ADDRESSES:** You may access information and comment submissions related to this document by searching on <http://www.regulations.gov> under Docket ID **NRC-2012-0055**. You may submit comments by the following methods:

- **Federal Rulemaking Web site:** Go to <http://www.regulations.gov> and search for Docket ID **NRC-2012-0055**. Address questions about NRC dockets to Carol Gallagher; telephone: 301-492-3668; e-mail: [Carol.Gallagher@nrc.gov](mailto:Carol.Gallagher@nrc.gov).

- **Mail comments to:** Cindy Bladley, Chief, Rules, Announcements, and Directives Branch (RADB), Office of Administration, Mail Stop: TWB-05-B01M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

- **Fax comments to:** RADB at 301-492-3446.

For additional direction on accessing information and submitting comments, see “Accessing Information and Submitting Comments” in the **SUPPLEMENTARY INFORMATION** section of this document.

**FOR FURTHER INFORMATION CONTACT:** Mr. William Holston, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; telephone: 301-415-8573; e-mail: [William.Holston@nrc.gov](mailto:William.Holston@nrc.gov).

## **SUPPLEMENTARY INFORMATION:**

### **I. Accessing Information and Submitting Comments**

#### *A. Accessing Information*

Please refer to Docket ID **NRC-2012-0055** when contacting the NRC about the availability of information regarding this document. You may access information related to this document by the following methods:

- **Federal Rulemaking Web Site:** Go to <http://www.regulations.gov> and search for Docket ID **NRC-2012-0055**.

- **NRC's Interim Staff Guidance Web Site:** The LR-ISG documents are also available online under the “License Renewal” heading at <http://www.nrc.gov/reading-rm/doc-collections/#int>.

- **NRC's Agencywide Documents Access and Management System (ADAMS):** You may access publicly-available documents online in the NRC Library at <http://www.nrc.gov/reading-rm/adams.html>. To begin the search, select “*ADAMS Public*”

[Documents](#)” and then select “[Begin Web-based ADAMS Search](#).” For problems with ADAMS, please contact the NRC’s Public Document Room (PDR) reference staff at 1-800-397-4209, 301-415-4737, or by e-mail to [pdr.resource@nrc.gov](mailto:pdr.resource@nrc.gov). The draft LR-ISG-2011-03 is available electronically under ADAMS Accession No. ML11244A058. The GALL Report and SRP-LR are available under ADAMS Accession Nos. ML103490041 and ML103490036, respectively.

- **NRC's PDR:** You may examine and purchase copies of public documents at the NRC’s PDR, Room O1-F21, One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852.

#### *B. Submitting Comments*

Please include Docket ID **NRC-2012-0055** in the subject line of your comment submission, in order to ensure that the NRC is able to make your comment submission available to the public in this docket.

The NRC cautions you not to include identifying or contact information in comment submissions that you do not want to be publicly disclosed. The NRC posts all comment submissions at <http://www.regulations.gov> as well as entering the comment submissions into ADAMS, and the NRC does not edit comment submissions to remove identifying or contact information.

If you are requesting or aggregating comments from other persons for submission to the NRC, then you should inform those persons not to include identifying or contact information in their comment submissions that they do not want to be publicly disclosed. Your request should state that the NRC will not edit comment submissions to remove such information before making the comment submissions available to the public or entering the comment submissions into ADAMS.

## **II. Background**

The NRC issues LR-ISGs to communicate insights and lessons learned and to address emergent issues not covered in license renewal guidance documents, such as the GALL Report and SRP-LR. In this way, the NRC staff and stakeholders may use the guidance in an LR-ISG document before it is incorporated into a formal license renewal guidance document revision. The NRC staff issues LR-ISG in accordance with the LR-ISG Process, Revision 2 (ADAMS Accession No. ML100920158), for which a notice of availability was published in the *Federal Register* on June 22, 2010 (75 FR 35510).

The NRC staff has developed draft LR-ISG-2011-03 to (a) include inspection recommendations for plants that will not have a cathodic protection system in the period of extended operation, (b) remove the recommendation to volumetrically inspect underground piping to detect internal corrosion, (c) base further increased inspection sample sizes on an analysis of extent of cause and extent of condition when adverse conditions are detected in the initial and subsequent doubled sample size rather than continuing to double the sample size, (d) add a recommendation that where damage to the coating is significant and the damage was caused by non-conforming backfill, an extent of condition evaluation should be conducted to ensure that the as-left condition of backfill in the vicinity of observed damage will not lead to further degradation, (e) add specific acceptance criteria for cathodic protection surveys, (f) add the specific preventive and mitigative actions utilized by the AMP in the FSAR Supplement description of the program as contained in the SRP-LR, and (g) make miscellaneous and editorial changes.

**Proposed Action**

By this action, the NRC is requesting public comments on draft LR-ISG-2011-03. This LR-ISG proposes certain revisions to NRC guidance on implementation of the requirements in 10 CFR Part 54. The NRC staff will make a final determination regarding issuance of the LR-ISG after it considers any public comments received in response to this request.

Dated at Rockville, Maryland, this 1<sup>th</sup> day of March 2012.

For the Nuclear Regulatory Commission.

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Melanie A. Galloway, Acting Director,  
Division of License Renewal,  
Office of Nuclear Reactor Regulation.